

STATE OF SOUTH CAROLINA

(Caption of Case)

Proposed Revisions to Articles 3 and 4 of the
Commission's Regulations

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2007 - 19 - EG

(Please type or print)

Submitted by: Len S. Anthony

SC Bar Number: 405

Telephone: 919-546-6367

Fax: 919-546-2694

Other: _____

Address: Progress Energy Service Company

P. O. Box 1551, PEB 17A4

Raleigh, NC 27602

Email: len.s.anthony@pgnmail.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda
expeditiously

☐ Other: _____

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

☐ Electric

☐ Electric/Gas

☐ Electric/Telecommunications

☐ Electric/Water

☐ Electric/Water/Telecom.

☐ Electric/Water/Sewer

☐ Gas

☐ Railroad

☐ Sewer

☐ Telecommunications

☐ Transportation

☐ Water

☐ Water/Sewer

☐ Administrative Matter

☐ Other: _____

☐ Affidavit

☐ Agreement

☐ Answer

☐ Appellate Review

☐ Application

☐ Brief

☐ Certificate

☐ Comments

☐ Complaint

☐ Consent Order

☐ Discovery

☐ Exhibit

☐ Expedited Consideration

☐ Interconnection Agreement

☐ Interconnection Amendment

☐ Late-Filed Exhibit

☒ Letter

☐ Memorandum

☐ Motion

☐ Objection

☐ Petition

☐ Petition for Reconsideration

☐ Petition for Rulemaking

☐ Petition for Rule to Show Cause

☐ Petition to Intervene

☐ Petition to Intervene Out of Time

☐ Prefiled Testimony

☐ Promotion

☐ Proposed Order

☐ Protest

☐ Publisher's Affidavit

☐ Report

☐ Request

☐ Request for Certification

☐ Request for Investigation

☐ Resale Agreement

☐ Resale Amendment

☐ Reservation Letter

☐ Response

☐ Response to Discovery

☐ Return to Petition

☐ Stipulation

☐ Subpoena

☐ Tariff

☐ Other: _____

Print Form

Reset Form



July 13, 2007

The Honorable Charles L. A. Terreni
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, S.C. 29210

Re: Proposed revisions to Articles 3 and 4 of the Commission's regulations;
Docket No. 2007-19-EG

Dear Mr. Terreni:

Progress Energy Carolinas, Inc. (PEC), by means of this letter, submits its comments on the proposed revisions to Articles 3 and 4 of the Commission's regulations.

The regulated electric and gas utilities serving the State of South Carolina and the Office of Regulatory Staff (ORS) commented on the Commission's proposed revisions to Articles 3 and 4 in mid-to-late 2006. Those comments were the result of a collaborative process that included workshops in which the Commission staff, the ORS, and the regulated utilities actively participated. In addition to the Commission's workshops, the regulated utilities and the ORS met and discussed numerous proposals and revisions, and worked diligently to reach accord on various provisions. Those negotiations resulted in the proposed revised regulations submitted to the Commission by the ORS on behalf of the regulated utilities and the ORS on March 7, 2007 ("Joint Proposal").

On May 9, 2007, the Commission filed proposed regulation amendments for Articles 3 and 4. PEC notes that the Commission's proposed regulations reflect, in many instances, the proposals contained in the March 7 Joint Proposal. However, PEC shares the concerns of the other parties in this proceeding that certain of the Commission's proposed revisions differ significantly from those developed by the utilities and the ORS. South Carolina Electric and Gas Company (SCE&G) has articulated these concerns in its comments, which are being filed under separate cover, and has offered additional comments to provide further justification for the proposed language reflected in the Joint Proposal submitted to the Commission on March 7, 2007. PEC concurs with SCE&G's comments, and respectfully requests that the Commission adopt the regulations as proposed in the Joint Proposal.

This comment letter incorporates by reference all prior written correspondence and comments received by the Commission from PEC relating to this docket, and the comments and proposed changes set forth in the letter from, and proposed revised regulations filed by, the ORS on behalf of the ORS and the utilities, including PEC, on March 7, 2007. PEC reserves the right

to make any additional comments it deems appropriate and does not waive any additional comments or arguments related to any issue regarding the proposed regulations.

PEC sincerely appreciates the opportunity to comment and provide input in this process. Thank you for the time and consideration given this important process by the Commission and its staff.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/

Len S. Anthony
Deputy General Counsel – Regulatory Affairs

LSA:mhm

cc: Jocelyn Boyd, Esquire
Shannon B. Hudson, Esquire
C. Lessie Hammonds, Esquire
Catherine D. Taylor, Esquire
K. Chad Burgess, Esquire
Catherine Heigel, Esquire
Richard L. Whitt, Esquire
James H. Jeffries, IV, Esquire
Randolph R. Lowell, Esquire